

EXHIBIT A

EXHIBIT A-TIME CHARGES

10/16/19-Drafting Mediation Order (.3).

11/27/19-Drafting Mediation Statement. (4.2).

11/28/19-Finalizing Mediation Statement. (2.6).

12/20/19-Travel and attendance at Mediation. (4.5).

1/16/19-Document production for Mediation. (.8).

2/27/19-Travel and attendance at Mediation. (4.3).

2/28/19-Drafting letter to A. Molbert. (1.7).

3/5/19-Drafting Kendall Declaration in Support of the Objection to the Claim of Andrew Molbert, Esq. (3.2); drafting Thiessen Declaration in Support of the Objection to the Claim of Andrew Molbert, Esq. (1.4). (4.6).

3/6/19-Revising Kendall Declaration in Support of the Objection to the Claim of Andrew Molbert, Esq. (.4); and revising Thiessen Declaration in Support of the Objection to the Claim of Andrew Molbert, Esq. (.5). (.9).

3/7/19-Drafting Points I and II of the Memorandum of Law in Support of the Objection to the Claim of Andrew Molbert, Esq. (3.2).

3/8/19-Drafting Point III of the Memorandum of Law in Support of the Objection to the Claim of Andrew Molbert, Esq. (1.3). (1.3).

3/9/19-Revising Point III of the Memorandum of Law in Support of the Objection to the Claim of Andrew Molbert, Esq. (.2).

3/11/19-Drafting Point V of the Memorandum of Law in Support of the Objection to the Claim of Andrew Molbert, Esq. (3.1); drafting Point VI of the Memorandum of Law in Support of the Objection to the Claim of Andrew Molbert, Esq. (.3); and drafting Point VII of the Memorandum of Law in Support of the Objection to the Claim of Andrew Molbert, Esq. (.3); and drafting Preliminary Statement for the Memorandum of Law in Support of the Objection to the Claim of Andrew Molbert, Esq. (2.3). (6.0).

3/13/19-Drafting and revising Point IV of the Memorandum of Law in Support of the Objection to the Claim of Andrew Molbert, Esq. (2.6).

3/14/19-Revising Memorandum of Law in Support of the Objection to the Claim of Andrew Molbert, Esq. (3.1).

3/17/19-Revising Memorandum of Law in Support of the Objection to the Claim of Andrew Molbert, Esq. (2.6).

3/19/19-Revising Memorandum of Law in Support of the Objection to the Claim of Andrew Molbert, Esq. (2.1).

3/22/19-Drafting Notice of Hearing for the Objection to the Claim of Andrew Molbert, Esq. (.2).

4/3/19-Drafting Objection to the Claim of Franklin Credit Management Corp. (2.4)

4/4/19-Drafting and revising Objection to the Claim of Franklin Credit Management Corp. (1.0); telephone call with A. Taveres re: hearing date (.1); drafting Notice of Hearing for Objection to the Claim of Franklin Credit Management Corp. (.2); drafting proposed Order (.2); drafting Certificate of Service (.2); drafting cover letter to Chambers (.2); and filing Objection to the Claim of Franklin Credit Management Corp. (.2). (2.1).

4/8/19-Review of Molbert's Memorandum of Law in Opposition to Motion for Summary

Judgment in state court action to prepare Reply and review of the cases cited therein. (2.6).

4/16/19-Review of New York Rule of Professional Conduct Rule 1.5(d) (.1); and review of the law of contracts, sufficiency of consideration and love and affection as consideration (.2). (.3).

4/24/19-Emails with A. Molbert re: adjournment of Objection to Molbert Claim hearing. (1.2).

4/25/19-Telephone call with Ms. D. Li re: adjournment of Objection to Molbert Claim hearing. (.1).

4/29/19-In person discussion with D. Li re: adjournment of Molbert Claim Objection (.3); emails to J. Drain re: adjournment of Molbert Claim Objection (.3). (.6).

4/30/19-Drafting Reply to the Objection of the Molbert Claim (3.2).

5/1/19-Drafting Reply to the Objection of the Molbert Claim (3.5).

5/6/19-Reviewing Molbert opposition papers to the Thiessen Objection to the Claim of Andrew Molbert, Esq. (1.4).

5/7/19-Drafting Reply in Support of the Thiessen Objection to the Claim of Andrew Molbert, Esq. (2.3).

5/8/19-Drafting Reply in Support of the Thiessen Objection to the Claim of Andrew Molbert, Esq. (3.4).

5/9/19-Reviewing and finalizing Reply in Support of the Thiessen Objection to the Claim of Andrew Molbert, Esq. (4.1).

5/10/19-Filing Thiessen Reply (.2) and email to A. Molbert re: his obligation to file documents with ECF and to provide Judge Drain with a courtesy copy (.1). (.3).

73.3 Hrs.